Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan

Sims Group UK Limited
22 Rondin Road
Ardwick
Manchester
M12 6BF

Environment Permit EPR/EB3803ME
***Exemption Number* WEX328914**
Supporting permit variation to add ELV and WEEE to permit

Date: March 2023

Reviewed by: Site Management and Environment Department

Sensitive Ecological Receptors (SER) within 1 km radius from the site boundary	Below listed SER have been identified and considered, but are at a distance to not be impacted via the source-pathway-receptor concept. These include: Some green spaces, water wells and River Medlock approx. 575m away. Please see Sensitive Ecological Receptor plan in FPP for more detail.

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
TO AIR FROM SITE ACTIVITIES						
Dusts and Particulates Releases of particulates or dust from the tipping of metal wastes Releases of particulates or dust from storage and handling of metal wastes.	Local human Population - Residential & Industrial Air quality AQMA in proximity to SSW of site	Air transport/ Wind blown	The waste materials handled are under normal circumstances of solid form and the potential for dust generation will therefore be limited. The permitted wastes will exclude wastes consisting solely or mainly of dusts, powders or loose fibres. Compliance with waste acceptance procedures will prevent the receipt of dust generating wastes. Wastes will be inspected at weighbridge and in unloading areas. The wastes will be adequately stored and treated in designated areas and in a manner to prevent the potential release of dusts and particulates. Storage and containment may include managed stockpiles, bays, bins, skips, containers, stillages, sacks or drums. All activities will take place on impermeable surface with sealed drainage system minimising the risk of generation of dusts from site surfacing. Integrity of the surfacing will be maintained.	Medium	Dust Nuisance, loss of amenity Respiratory illness	Low / Not significant with measures indicated in place

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
Releases of particulates or dust from processing of Scrap Metal with aid of mechanical means Releases of particulates or dust from the movement of vehicles on site. Releases of dust and particulates during ELV activities Releases of dust and particulates during WEEE storage activities			Infrastructure improvement plans are in place where required. Dust/particulates will be controlled through the ongoing monitoring of site operations by the site management team who will undertake regular visual inspections and undertake remedial action if dust/particulates are identified as a problem. Good housekeeping will be employed to reduce quantities of particulates and dust on the site. Site housekeeping will involve regular cleaning and maintenance of any plant and sweeping of operational areas to reduce build up of dust. Dust suppression techniques such as dampening and the use of a mechanical sweeper will be employed as necessary to keep surfaces clean and prevent unacceptable emissions. Materials will be handled with suitable scrap handling equipment and employees will be appropriately trained. Drop heights will be kept to a minimum to prevent the generation of fugitive emissions of dusts. Distances that material has to travel will be kept to a minimum with due care and consideration being given to unloading and loading areas and distance from storage area. Traffic speed including vehicles and mobile plant will be limited to minimise dust generation by vehicle movement on site. Vehicles will be sheeted where appropriate which will also assist to minimise dust escape. Any complaints regarding dusts/particulates will be investigated and appropriate action taken if the site is found to be the source of the emission. All complaints will be recorded. ELV treatment will be carried out within a building / under cover. Material is bulk scrap, not dusty and operation unlikely to release dust. Waste Electrical and Electronic Equipment (WEEE) material is bulk scrap and is not dusty, activity is storage only, operation unlikely to release dust.			

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
Noise & Vibration from General scrap handling/ tipping of metal wastes onto concrete surface or other metals Moving metal wastes on site, loading containers, skips & ships From plant, machinery and vehicle movements Treatment operations incl. mechanical treatment of scrap metal ELV treatment WEEE Storage	Local human Population Residential & Industrial Ecosystems/ habitats Structures listed building approx. 0.5km SE and SW	Air transport and vibration through the ground	Mobile plant and vehicles within the control of Sims Group UK Limited and subcontractors will be maintained to current recommended standards, in line with manufacturer recommendations. 360 Material Handler and Site Fork Lift Trucks (FLT's) are fitted with Broad band (white noise) reversing alarms to eliminate any noise associated with conventional safety alert systems. Lorries accessing the site may use tonal reversing alarms. The site has no control over these and, as such, this is not considered to be an issue that BAT can address. Vehicles, plant and machinery will be switched off when not in use where practicable. Delivery vehicles will be processed as quickly as possible to minimise noise from engines, reversing warning signals etc. Sympathetic driving of vehicles will reduce unnecessary revving of engines. Drop heights (deliveries and products) will be kept to the practical minimum in line with company best practice plus sympathetic handling of material will reduce the potential for noise emissions. Employees will be trained in work procedures and Environment awareness training. Where appropriate, signs will be erected reminding site management and visitors that noise can be a nuisance. Employees will undertake regular inspections and undertake remedial action if noise or vibrations are identified as a problem. Any complaints regarding noise or vibration will be investigated and appropriate action taken if the site is found to be the source. All complaints will be recorded.	Medium	Noise Nuisance, loss of amenity	Low / Not significant with measures indicated in place

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
Odour from Waste activities From post consumption fe/al cans /aerosols From cutting operations From stagnant water in drainage system. ELV treatment WEEE storage	Local human Population - Residential & Industrial	Air transport/ Wind blown	In general, the waste types handled will be unlikely to give rise to malodours and compliance with waste acceptance procedures to prevent receipt of odour generating wastes. Control and monitoring of waste acceptance procedures will ensure wastes likely to cause malodours are minimised. Any odorous material will be handled accordingly and removed from site as a priority. The processes undertaken on site will not give rise to malodors or residues with malodors. Employees will undertake regular inspections and undertake remedial action if odour is identified as a problem. Where there is the potential for malodours, quantities of wastes stockpiled will be kept to a minimum. Good housekeeping will be implemented across the site to minimise the risk of odours occurring. Any complaints regarding odour will be investigated and appropriate action taken if the site is found to be the source of odour. All complaints will be recorded. Drainage systems will be inspected and maintained to minimise the odours associated with stagnating water. ELV treatment does not give rise to odours. Fluids will be removed by dedicated equipment and stored in designated tanks. WEEE storage does not give rise to odours. The potential exception could be from refrigeration units which are managed as follows: Refrigeration units (ELF) will be free from food wastes. All loads are inspected prior to acceptance. Any odours material identified will be handled accordingly and removed from Site as a priority. Site employees will undertake regular inspections and undertake remedial action if odour is identified as a problem. Any complaints regarding odour will be investigated and appropriate action taken if the Site is	Low or very low	Odour Nuisance, loss of amenity	Low / Not significant with measures indicated in place

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
			found to be the source of odour. All complaints will be recorded. In abnormal conditions e.g. – Extreme hot weather the potential for wastes to give rise to malodours is not considered to be significant, as ELF only accepted if free from food wastes/odours material removed from Site as a priority.			
Ozone Depleting Substances in Fridges and air conditioning units Ozone depleting substances in ELV air conditioning	Air quality AQMA in proximity to SSW of site	Air Transport /Wind blown	Waste acceptance criteria will ensure that wastes containing ODS will be identified and adequately segregated and stored. Inspections at weighbridge and unloading areas will ensure that where not specified, wastes are free from materials containing ODS Where applicable, certification from suppliers that raw material is free of Ozone depleting substances will be requested. All fridges and freezer wastes containing ODS will be stored in a designated area, handled to minimise damage and consigned to Sims Specialist Fridge treatment Facilities. Depollution of ELV will be undertaken in accordance with ELV Regulations. Air conditioning gasses are removed using specialist equipment, which will be maintained & fit for purpose. The removed refrigerants will be stored appropriately and removed to a suitably authorised facility.	Low	Release of ODS and deterioration of air quality	Low/Not significant with measures indicated in place
Evaporative emission of Volatile Organic Compounds (VOC's) from ELV depollution petrol storage and spillages	Local human Population - Residential & Industrial Structures listed building approx. 0.5km SE and SW Air quality AQMA in	Air Transport /Wind blown	Insignificant source of fugitive emissions of VOC. There will be no treatment of petroleum products, no petroleum combustion processes on sites. No storage of petroleum for use, and vehicles/plant used on site are almost entirely diesel. ELV depollution will be undertaken in accordance with ELV Regulations. Petroleum products will be removed using specialist equipment into designated sealed storage vacuum tank. Integrity of tanks and function of gauges will be regularly checked. Undepolluted ELV storage will be regularly inspected. Spillages of petroleum products unlikely. However, spill kits will be available and any spills will be attended to immediately.	Very Low	Deterioration in local air quality. Can react with NOx to form ground-level ozone	Very Low/Not significant

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	proximity to SSW of site					
Emissions from vehicles & mobile and static plant	Local human Population - Residential & Industrial Ecosystems/ habitats Air quality AQMA in proximity to SSW of site	Air transport	Vehicles will be fitted with catalytic converter where appropriate to reduce emissions. Sympathetic driving of vehicles and operation of static and mobile plant will reduce fuel consumption and thus emissions. Vehicles will not be left idling or used unnecessarily and where appropriate, plant or machinery will be switched off when not in use.	Medium	Deterioration in local air quality.	Very Low/Not significant
Visible plume Smoke from oxy propane cutting/ burning activities	Local human Population - Residential & Industrial Air quality AQMA in proximity to SSW of site	Air Transport	Operations will be managed with due regard to preventing emissions beyond the boundary causing a nuisance. Employees will be suitably trained. Fire prevention measures will be adopted. Any complaints regarding smoke will be investigated and appropriate action taken. All complaints will be recorded.	Medium	Nuisance	Low/Not significant with measures indicated in place
TO WATER FROM SITE ACTIVITIES						
Potentially contaminated run off from Waste	United Utilities Sewer Ground Water no	Run-off, via drainage system Through	All activities will take place on impermeable surface with sealed drainage system. The integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Infrastructure improvement plans are in place where required. Drainage system will be shown on site plans and locations of sumps, storage tanks etc are	Medium	Deterioration of water quality of aquatic ecosystems	Low/Not significant with measures indicated in place

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
storage and treatment including oil contaminated materials, ELV depollution, WEEE storage Waste Reception	SPZ Land Ecosystem/ habitats	the ground or cracks in impermeable surface	detailed. Drainage system including gulleys, drains, silt traps and interceptors are regularly inspected and maintained where appropriate. Interceptor will periodically be cleaned out. Good housekeeping will prevent the build up of dust/ mud and debris on site which has the potential to adversely affect the water quality. Please see dust and particulates and mud and debris section for more details. The discharge from site will be monitored visually and also sampled in accordance with internal guidance. Compliance with waste acceptance procedures will prevent the receipt of non permitted wastes and ensure wastes are adequately stored. There will be a prohibited material sign at the gate. Duty of care will ensure a written description of waste is obtained. Employees will be suitably trained and wastes will be inspected at weighbridge and unloading areas. Further inspections will take place during material handling. Procedures will be in place to inspect wastes received and ensure these materials if received inadvertently, they will be quarantined, stored accordingly and removed to suitably authorised facility. The wastes will be adequately stored and treated in designated areas and in a manner so as to prevent the escape of potentially contaminating run off. Hazardous wastes will be stored on impermeable pavement sealed drainage system with additional containment where appropriate. For eg. lead acid batteries will be stored in leak proof acid resistant containers with lids to prevent the ingress of water. Non-ferrous metal filings and turnings (Swarf) will be stored in bulk bags, skips, containers or bays in a building to prevent the ingress of rainwater and the escape of cutting fluids. Wastes which are contaminated with oils will not be accepted. Where received inadvertently, they will be adequately contained in a sealed bay or container in which residues will be contained and from which residues can be removed when required. Wherever possible the containment will be covered to minimise the ingress of water.		Contamination of groundwater Contamination of land Loss of amenity Loss of resource	

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
			Employees will undertake regular inspections of waste storage areas. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Emergency Contingency Plan will be in place which will include documented procedures for handling spillages to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness.			
TO LAND FROM SITE ACTIVITIES						
Mud and Debris Mud and debris from wastes received on site Mud and debris generated on site	Local human Population - Residential & Industrial Highways Rondin Road	Vehicles entering and leaving site	The waste materials handled will under normal circumstances be of solid form and the potential for generation of mud and debris is therefore limited. Compliance with waste acceptance procedures will prevent the receipt of wastes likely to generate mud or debris. The wastes and process residues will be adequately stored and treated in designated areas and in a manner so as to prevent the potential release of debris. Storage and containment may include managed stockpiles, bays, bins, skips, containers, stillages, sacks or drums. All activities will take place on impermeable surface with sealed drainage system minimising the risk of generation of mud and debris from site surfacing. Integrity of the surfacing will be maintained. Infrastructure improvement plans are in place where required. Mud and debris will be controlled through the on-going visual monitoring of site operations by the site management team who will undertake regular visual inspections and undertake remedial action if a problem is identified. Good housekeeping will be employed to reduce quantities of mud and debris on the site. Use of a manual/mechanical sweeper will be employed as necessary to keep surfaces clean and minimise unacceptable build up on site and prevent emissions from site. Materials will be handled with suitable scrap handling equipment and employees appropriately trained.	Low	Mud Nuisance, loss of amenity. Health & Safety.	Low / Not significant with measures indicated in place

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
			All plant and machinery associated with the site operations will be subject to a preventative maintenance programme and inspected on a daily basis. Any complaints regarding mud and debris will be investigated and appropriate action taken if the site is found to be the source of the emission. All complaints will be recorded.			
Litter from wastes received on site Litter from storage of waste and process residues	Local human Population - Residential & Industrial Ecosystem & habitat Highways Rondin Road	Air transport/ Wind blown Scavenger Birds and animals – Pests Vehicles entering and leaving site	The waste materials handled will under normal circumstances be of heavy solid form and the potential for litter generation is therefore limited. Compliance with waste acceptance procedures will prevent the receipt of litter generating wastes. Duty of care - the wastes and process residues will be adequately stored and treated in a manner so as to prevent the potential release of litter. This containment will be sufficient to prevent escape of litter and may constitute a designated storage bay or skip. Wastes with significant potential to generate fugitive emissions of litter would be stored in a covered skip, container or sack. Drop heights and tipping heights will be kept to a minimum. Where appropriate, vehicles, skips, containers will be covered which minimises risk of wastes escaping the control of the producer/haulier/site operator. Employees will undertake regular inspections and undertake remedial action if litter is identified as a problem. Good housekeeping will be implemented across the site to minimise the risk of litter accumulating on site. Mechanical/ Manual sweeping will be available to collect litter. Site perimeter fencing will prevent escape of litter from site. The waste materials handled will under normal circumstances be unlikely to contain wastes that attract pests and the likelihood of pests carrying litter from site will be negligible. Plus, appropriate measures to prevent/ minimise pests will include regular inspections by site management and where appropriate, pest control contractors. Emergency Contingency Plan will be in place which will include documented procedure for dealing with an escape of waste to minimise impacts.	Low	Litter Nuisance, loss of amenity	Low / Not significant with measures indicated in place

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
			Employees will have training on emergency contingency plan and environmental awareness. Any escape of litter beyond the boundary of the site will be cleared up as soon as it is practicable and safe to do so. Any complaints regarding litter will be investigated and appropriate action taken if the site is found to be the source of litter. All complaints will be recorded.			
Vermin disease, impact people & on wildlife	Local Human Population - Residential & Industrial Ecosystem & habitat	Migration of vermin from site.	Wastes handled will not attract vermin. Daily yard environmental inspections will be undertaken. Contractor will be used, where required to control vermin and records of actions will be kept.	Low	H&S implications eg weils disease, nuisance Habitat & fauna disturbance	Low / Not significant with measures indicated in place
TO AIR, WATER & LAND FROM ACCIDENTS						
Containers or boxes could be dropped or contents spilt during transfer. Forks could puncture containment	United Utilities Sewer Ground Water no SPZ Land Ecosystem/ habitats	Run-off, via drainage system Through the ground or cracks in impermeable surface	All activities will take place on impermeable surface with sealed drainage system and the integrity of the surfacing and drainage system are monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Plant operatives will be suitably trained and experienced. Vehicles will be suitably maintained in accordance with manufacturers guidelines. Appropriate containment will be used, including lids where appropriate. Careful location of containment of substances with pollution potential will minimise risk of damage of containment. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Emergency Contingency Plan will be in place which will include documented procedure for dealing with an escape of waste to minimise impacts.	Low	Contamination of local watercourse or sewer Deterioration of water quality of aquatic ecosystems	Low/ Not significant with measures indicated in place

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
			Employees will have training on emergency contingency plan and environmental awareness. .			
Overfilling vessels	United Utilities Sewer Ground Water no SPZ Land Ecosystem/ habitats	Run-off, via drainage system Through the ground or cracks in impermeable surface	All activities will take place on impermeable surface with sealed drainage system and the integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Vessels for storage of liquids will have secondary containment and will be fitted with a means of gauging the contents to prevent overfilling. Vessels will be filled to a maximum of 95% volume as per EA guidelines. Deliveries may be attended by an employee if required. Approved suppliers/contractors will be used. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Emergency Contingency Plan will be in place which will include documented procedure for dealing with an escape of waste to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness.	Low	As above	Low/ Not significant with measures indicated in place
Plant or equipment failure. Resulting in spillage e.g. hydraulic pipe failure	United Utilities Sewer Ground Water no SPZ Land Ecosystem/ habitats	Run-off, via drainage system Through the ground or cracks in impermeable surface	All activities will take place on impermeable surface with sealed drainage system and the integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Scheduled programme of maintenance for plant and equipment will be in place. Approved contractors will be used and records kept. Inspections/ check sheets will be completed in accordance with company policy. Employee training is undertaken and the correct equipment will always be used for specific tasks. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Emergency Contingency Plan will be in place which will include documented procedure for	Low	As above	Low/ Not significant

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
			dealing with an escape of waste to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness.			
Containment failure including: Leak from diesel storage Leak from oil storage Breach of containment bund. Breach of containment sealed storage bay Vandalism of containment Security Breach Breakage of stillages or containers containing hazardous wastes such as batteries	United Utilities Sewer Ground Water no SPZ Land Ecosystem/ habitats	Run-off, via drainage system Through the ground or cracks in impermeable surface	All activities will take place on impermeable surface with sealed drainage system and the integrity of the surfacing and drainage system will be monitored and maintained minimising the risk of contaminated run off escaping the containment of site. Improvement plans will be in place where required. Drainage system including gullys, drains, silt traps and interceptors will be regularly inspected and maintained where appropriate. Interceptor will periodically be cleaned out. Drainage system will be shown on site plans and locations of sumps, storage tanks etc are detailed. Good housekeeping will ensure spills are attended to immediately. All potential polluting liquids (both for use and wastes) will be stored in containers with secondary containment capable of holding more than 110% of the tank capacity. The ancillary equipment will also be bunded. The capacity and integrity of bunds will be monitored and remedial action taken where necessary. Drums and IBC will also be appropriately contained. Bunded storage and drip trays will not be over loaded. All containers will be labelled. Wastes which may be potentially contaminated with oils will be adequately contained. These will be regularly inspected. Spill kits will be located at key locations on site and will be mobile so that they may be taken to the site of an incident. Spillages will be attended to immediately. Storage areas will be regularly inspected. Damaged/leaking storage containers will be repaired/ replaced. Emergency Contingency Plan will be in place which will include documented procedures for handling spillages to minimise impacts.	Low	Contamination of local watercourse or sewer Deterioration of water quality of aquatic ecosystems	Low/ Not significant with measures indicated in place

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
Leak from ELV residues tank storage			Employees will have training on emergency contingency plan and environmental awareness. The site will be secure minimising the risk of unauthorised access & vandalism. The site will be monitored by security personnel, site fencing and gates locked when site closed. Significant spills will be recorded and corrective and preventative actions taken.			
Fumes/ smoke from accidental combustion of incoming / stored wastes; or Vandalism/Arson	Local Human Population - Residential & Industrial Ecosystem & Habitats	Air Transport /Wind blown	Site has a Fire Prevention Plan. Waste acceptance procedures as previously detailed will minimise risk of acceptance of wastes likely to accidently combust. Inspection of loads at weighbridge and unloading area and subsequently during handling facilitates segregation of wastes with combustion potential such as unidentified closed or sealed containers, gas cylinders and other wastes as appropriate. Scrap will be inspected to ensure no signs of combustion or heating. Non conforming wastes will be quarantined and dealt with appropriately. Permitted activity does not allow burning waste. Wastes will not be burnt on site. Site security measures will prevent unauthorised access and minimise risk of arson. Emergency Contingency Plan will be in place which will include documented procedures for dealing with fires. Employees will have training on emergency contingency plan and environmental awareness. Fire prevention, management and training will be undertaken. Fire-fighting equipment will be in key locations, site employees appropriately trained in use of fire fighting equipment and Emergency Contingency Plan. Regular inspections of fire fighting equipment and annual maintenance in accordance with H&S legislation will be undertaken. Fire risk assessment /audits will be performed. Maintenance will be carried out by trained personnel with awareness training.	Low	Smoke nuisance, loss of amenity, respiratory irritation Deterioration of air quality Chance of fire spreading.	Low / Not significant with measures indicated in place

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Risk
Failure to contain Fire Fighting water	United Utilities Sewer Ecosystems	Drainage system	Drainage infrastructure is designed to direct water to interceptor. Site Management and Fire Brigade will be responsible in event of emergency. Site has a fire prevention plan. Emergency Contingency Plan will be in place which will include documented procedures in event of a fire.	Low	Contamination of sewer or local watercourse	Low / Not significant
Incompatible wastes coming into contact	Local human Population Residential & Industrial & air, water and land	Drainage system, Air Transport	Waste acceptance and control procedures as detailed above will be in place. Non-conforming waste types will be rejected or quarantined. Waste handled easily identifiable and with solid properties that mean they are generally compatible with other waste types handled. Emergency Contingency Plan will be in place which will include documented procedures for dealing with non-conforming wastes to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness. Designated storage areas /quarantine areas will be allocated for non-conforming wastes.	Low	Fumes, smoke nuisance, potential H&S implications. Contamination of waters	Low/Not significant
Flooding	Local human Population - Residential & Industrial Ecosystem/ habitat Structures United Utilities Sewer	Water transport	Individual Risk assessment carried out with regard to flooding from Rivers / sea / surface waters and reservoirs using EA Flood Mapping tool, which shows that the site is at low risk of flooding. Site specific topography will be considered with regard to localised flooding from drainage systems. There is no history of flooding at site. Site has drainage system with interceptor which will be monitored and regularly maintained to prevent build up of debris and ensure efficient operation. Emergency Contingency Plan will be in place which will include documented procedures for responding in the event of a flood to minimise impacts. Employees will have training on emergency contingency plan and environmental awareness.	Low	H&S implications. Contaminants and materials washed from site and deposited elsewhere. Contamination of water systems and land. Damage to on site structures	Low / Not significant with measures indicated in place